III. Amendments to the Drawings

The attached drawing sheet includes changes to Fig. 1. This sheet, which includes Figs. 1 and 2, replaces the original sheet including Figs. 1 and 2. In Figure 1, previously omitted reference numeral 125 has been added.

IV. Remarks/Arguments

Claims 1-20 were originally filed in the present application. Claims 2, 12 and 16 are currently canceled without prejudice or disclaimer, and no claims are currently added. Thus, claims 1, 3-11, 13-15 and 17-20 remain pending in the present application. Reconsideration of this application in light of the above amendments and the following remarks is respectfully requested.

Rejections under 35 U.S.C. §102

Claims 1-3 and 5-20 have been rejected under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 6,163,074 to Lee, et al. ("Lee"). However, claims 2, 12 and 16 are currently canceled without prejudice or disclaimer, thus rendering their rejection moot. Moreover, Applicants traverse the remaining rejections for the following reasons.

Claim 1

The PTO provides in MPEP §2131 that: "to anticipate a claim, the reference must teach every element of the claim." Therefore, to support a rejection of claim 1, Lee must contain all of the elements of claim 1. However, Lee does not disclose an electrode having a plurality of discrete conductors separated by portions of a dielectric layer, wherein each of the plurality of discrete conductors has a first surface configured to be bonded to external circuitry and a second surface opposite the first surface. Consequently, Lee also fails to disclose a plurality of conductive members located in an insulating layer, wherein ones of the plurality of conductive members contact the second surface of corresponding ones of the plurality of discrete conductors of the electrode.

One of the above-described shortcomings of Lee with respect to claim 1 regards the electrode including a plurality of discrete conductors separated by portions of a dielectric layer, which was previously recited in now-canceled claim 2 of the present application. Applicants respectfully note that the Examiner has not indicated where in the Lee patent that this subject matter is disclosed. However, now-canceled claim 12 previously recited subject matter similar to that of claim 2, and the Examiner has indicated that, with respect to claim 12, Lee shows that "forming the electrode includes forming a plurality of discrete conductors 245 separated by portions of a dielectric layer." (Examiner's Office Action, page 4, paragraph 12). However, as shown in Figs. 3-7 of Lee, Lee's conductive plugs 245 are not part of an electrode (e.g., aluminum interconnection layer 260) to which a wire bond 320 is made. More specifically, Lee's conductive plugs 245 do not include a surface configured to be bonded to external circuitry, among other limitations recited in claim 1 of the present application. In contrast, Lee's conductive plugs 245 are merely configured to contact the aluminum interconnection layer 260. It is the aluminum interconnection layer 260, not the conductive plugs 245, which includes a surface that is configured to be bonded to external circuitry (via wire bond 320).

For at least these reasons, the §102 rejection of claim 1 is not supported by Lee, and should be withdrawn.

Claim 11

As described above, to support a rejection of claim 11, Lee must contain all of the elements of claim 11. However, as also described above, Lee does not disclose forming an electrode having a plurality of discrete conductors separated by portions of a dielectric layer, wherein each of the plurality of discrete conductors has a first surface configured to be bonded to external circuitry and a second surface opposite the first surface. Consequently, Lee also fails to disclose forming a plurality of conductive members located in an insulating layer, wherein ones of the plurality of conductive members contact the second surface of corresponding ones of the plurality of discrete conductors of the electrode. Accordingly, the §102 rejection of claim 11 is not supported by Lee, and should be withdrawn.

Claim 15

As described above, to support a rejection of claim 15, Lee must contain all of the elements of claim 15. However, as also described above, Lee does not disclose an electrode having a plurality of discrete conductors separated by portions of a dielectric layer, wherein each of the plurality of discrete conductors has a first surface configured to be bonded to external circuitry and a second surface opposite the first surface. Consequently, Lee also fails to disclose a plurality of conductive members located in an insulating layer, wherein ones of the plurality of conductive members contact the second surface of corresponding ones of the plurality of discrete conductors of the electrode. Accordingly, the §102 rejection of claim 15 is not supported by Lee, and should be withdrawn.

V. Conclusion

It is clear from all of the foregoing that independent claims 1, 11 and 15 are in condition for allowance. Dependent claims 3-10, 13, 14 and 17-20 depend from and further limit independent claims 1, 11 and 15 and, therefore, are allowable as well.

It is believed that all matters set forth in the Office Action have been addressed. Favorable consideration and an early indication of the allowability of claims 1, 3-11, 13-15 and 17-20 are respectfully requested. Should the Examiner deem that an interview with Applicants' undersigned attorney would expedite consideration, the Examiner is invited to call the undersigned attorney at the telephone number indicated below.

Respectfully submitted,

Dave R. Hofman
Registration No. 55,272

Dated: 10/3/05

HAYNES AND BOONE, LLP
901 Main Street, Suite 3100
Dallas, Texas 75212-3789
Telephone: 972/739-8630
IP Facsimile No. 214/200-0853

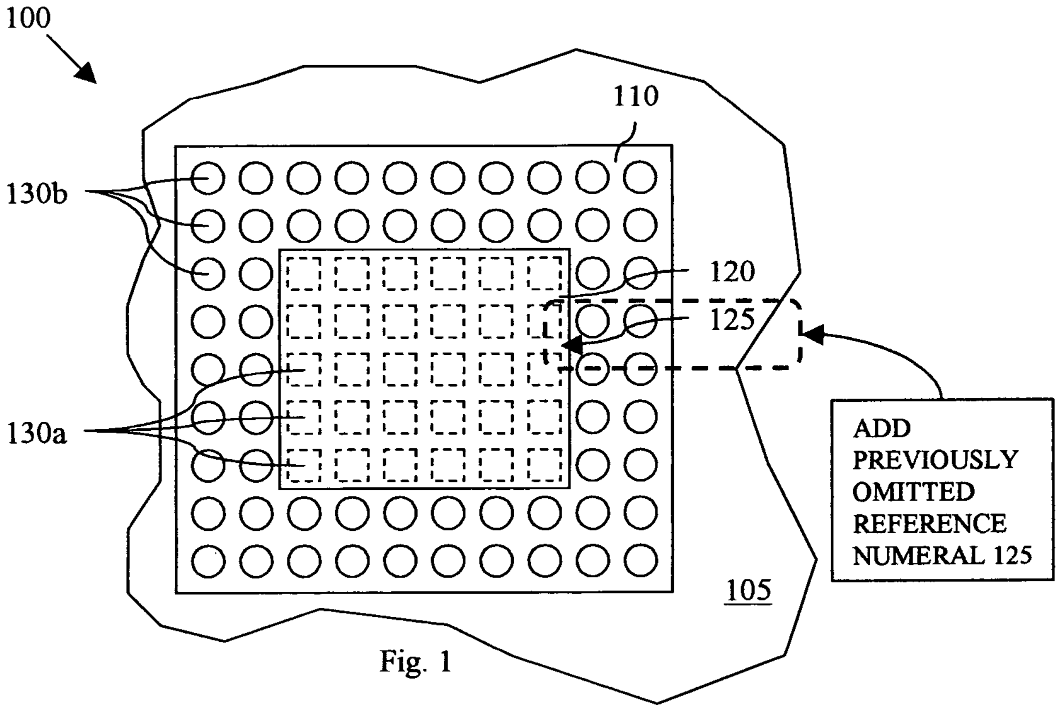
EXPRESS MAIL NO.: EV622991326US

DATE OF DEPOSIT: October 3, 2005

This paper and fee are being deposited with the U.S. Postal Service Express Mail Post Office to Addressee service under 37 CFR §1.10 on the date indicated above and is addressed to the Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450

Karen L. Underwood
Name of person mailing paper and fee

Karen L. Underwood
Signature of person mailing paper and fee



ADD PREVIOUSLY OMITTED REFERENCE NUMERAL 125

Fig. 1

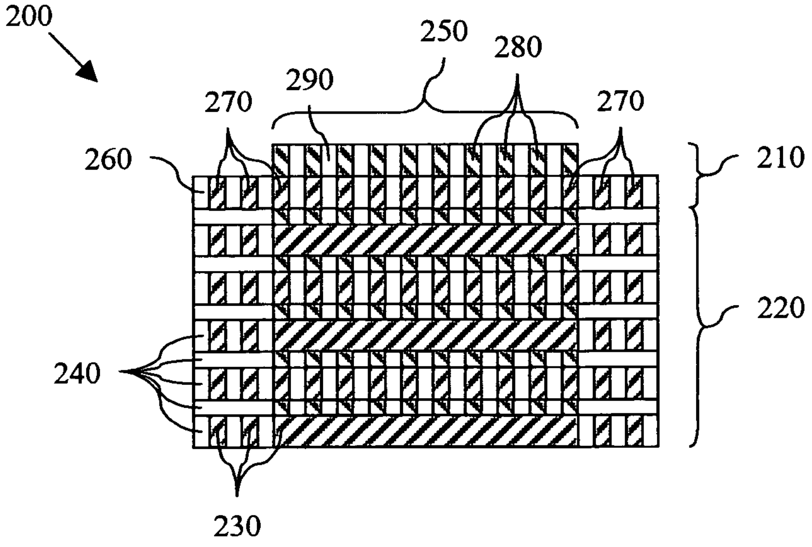


Fig. 2

ANNOTATED DRAWING SHEET SHOWING CHANGES